



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 10**

1200 Sixth Avenue, Suite 900  
Seattle, WA 98101-3140

OFFICE OF  
ECOSYSTEMS,  
TRIBAL AND PUBLIC  
AFFAIRS

December 17, 2012

Teresa Raaf  
Forest Supervisor  
Malheur National Forest Supervisors Office  
431 Patterson Bridge Road  
P.O. Box 909  
John Day, Oregon 97845

Re: Comments on the DEIS for Summit Logan Valley Grazing Authorization Project  
(EPA Project Number: 12-0061-AFS).

Dear Ms. Raaf:

In accordance with our responsibilities under Section 309 of the Clean Air Act and the National Environmental Policy Act (NEPA), the U.S. Environmental Protection Agency has reviewed the U.S. Forest Service Draft Environmental Impact Statement (DEIS) for Summit Logan Valley Grazing Authorization Project (CEQ number: 20120347) on Prairie City Ranger District of the Malheur National Forest in Grant County, Oregon.

Based on our review, we have assigned a rating of LO (Lack of Environmental Objections) to the Preferred Alternative (Alternative 4). A summary of the EPA's rating is attached.

The DEIS evaluates potential environmental impacts of authorizing continued livestock grazing in the Summit Logan Valley Grazing Authorization Project area that includes Lake Creek (10,196 acres), Logan Valley (3,756 acres), McCoy Creek (980 acres) and Summit Prairie (25,331) allotments. The analysis area would be about 40,263 acres of public lands and within which there are nearly 5,000 acres of private land.

The DEIS considered four alternative actions, including a proposed action (Alternative 2), Preferred Alternative (Alternative 4) and No Action (Alternative 1). Under the Preferred Alternative, FS would authorize grazing on Logan Valley, McCoy Creek and Summit Prairie allotments and modify management to include no grazing on almost 9,459 acres of Lake Creek allotment, additional grazing area for Logan Valley (603 acres) and Summit Prairie (52 acres). Implementation of the proposed project would also require modifications to the Malheur Forest Plan Amendment #29 to address streamside shade and renewal of existing Allotment Management Plans approved in the 1960s and 1970s.

The EPA supports the overall goals of the proposed action to allocate forage for livestock grazing, while improving range conditions particularly in riparian areas, and a grazing strategy that combines early season, rest-rotation grazing systems with fences and water developments to preserve and protect resources. We also commend Forest Service staff for considering public comments in the NEPA

analysis for the project and modifying alternatives in response to inputs received. Additionally, we support Forest Service's selection of Alternative 4 as the Preferred Alternative for implementation as it includes additional measures in the Summit Prairie allotment to encourage recovery of riparian vegetation to enhance stream shade, riparian vegetation composition and vigor, and streambank stability.

Overall, we believe the DEIS includes a good description of resources within the project area, analysis of anticipated environmental impacts, measures to offset the impacts, and monitoring programs (p. 77-82) to meet resource management objectives and other requirements. We would encourage additional early actions to address impaired streams currently listed by the State of Oregon as violating water quality standards, primarily for temperature (p. 214). We believe that additional, early actions to increase shade and improve flood plain function (in terms of channel morphology and connection to groundwater) would benefit the project. Such early actions would also benefit the many riparian areas in the Summit Prairie allotments presently functioning at risk. Additional protection of certain riparian areas may be warranted, especially within the Summit Prairie allotment where many creeks are not expected to meet desired conditions for a number of years, and other areas where impacts may affect high quality habitat(s), drinking water sources, or other sensitive resources.

Because bacteria and nutrients are usually associated with livestock grazing, we recommend that the final EIS also include available data on these parameters for streams in the project area. We recognize that actions in the Preferred Alternative would likely result in water quality benefits for these parameters as well as temperature. For additional perspective on addressing water quality impairments on National Forest System Lands, please consult the 2007 Memorandum of Agreement (MOA)<sup>1</sup> between the EPA and Forest Service in addition to the 2002 MOA between the Forest Service and Oregon Department of Environmental Quality.

We applaud and encourage continued coordination with the Oregon Department of Environmental Quality and the US Fish and Wildlife and National Marine Fisheries Services. The final EIS should include outcomes of consultations with the Services and recommended measures to reduce risks and protect biota and habitat.

Thank you for the opportunity to review and comment on this DEIS. If you have questions about our comments, please contact me at (206) 553-1601 or by electronic mail at [reichgott.christine@epa.gov](mailto:reichgott.christine@epa.gov) or contact Theogene Mbabaliye of my staff at (206) 553-6322 or by electronic mail at [mbabaliye.theogene@epa.gov](mailto:mbabaliye.theogene@epa.gov).

Sincerely,



Christine B. Reichgott, Manager  
Environmental Review and Sediment Management Unit

Enclosure

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<sup>1</sup> [http://water.epa.gov/lawsregs/lawsguidance/cwa/tmdl/usfsepamoa\\_memo.cfm](http://water.epa.gov/lawsregs/lawsguidance/cwa/tmdl/usfsepamoa_memo.cfm)

**U.S. Environmental Protection Agency Rating System for  
Draft Environmental Impact Statements  
Definitions and Follow-Up Action\***

**Environmental Impact of the Action**

**LO – Lack of Objections**

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

**EC – Environmental Concerns**

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

**EO – Environmental Objections**

EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

**EU – Environmentally Unsatisfactory**

EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

**Adequacy of the Impact Statement**

**Category 1 – Adequate**

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

**Category 2 – Insufficient Information**

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

**Category 3 – Inadequate**

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

\* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.